

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

MASON CAPITAL L.P., and MASON
CAPITAL, LTD.

Plaintiffs,

V.

PERRIGO CO., PLC, *et al.*,

Defendants.

ECF Case
Document Electronically Filed

Civil Action No. 2:18-CV-01119-MCA-LDW

PENTWATER EQUITY OPPORTUNITIES MASTER FUND, LTD., PENTWATER EVENT DRIVEN CAYMAN FUND LTD., PENTWATER MERGER ARBITRAGE MASTER FUND LTD., PWCM MASTER FUND LTD., OCEANA MASTER FUND LTD., LMA SPC FOR AND ON BEHALF OF MAP 98 SEGREGATED PORTFOLIO, and AMUNDI ABSOLUTE RETURN PENTWATER FUND PLC (F/K/A AAI PENTWATER FUND PLC – PENTWATER EVENT EQUITY REFLECTION FUND),

Plaintiffs,

V.

PERRIGO CO., PLC, *et al.*,

Defendants.

Civil Action No. 2:18-CV-01121-MCA-LDW

STIPULATION AND [PROPOSED] ORDER

WHEREAS, the complaints in the above-captioned individual actions (the “Individual Actions”) have been designated as related actions to the June 21, 2017 Amended Complaint for Violation of the Federal Securities Laws (the “Amended Complaint”) in *Roofer’s Pension Fund v. Papa, et al.*, No. 2:16-cv-2805-MCA-LDW (the “Consolidated Class Action”);

WHEREAS, plaintiffs and defendants in the Individual Actions stipulated and agreed on February 20, 2018 that they would confer and submit a proposed schedule for the filing of answers or other responses to the complaints in the Individual Actions no more than thirty (30) days after the Court in the Consolidated Class Action issued an opinion on the motions to dismiss the Amended Complaint in the Consolidated Class Action (the “Motion to Dismiss”), which the Court in each of the Individual Actions so-ordered on February 21, 2018;

WHEREAS, on July 27, 2018, the Court in the Consolidated Class Action issued an opinion granting in part and denying in part the Motions to Dismiss (2018 WL 3601229);

WHEREAS, on August 24, 2018, the parties jointly sought an extension until September 14, 2018 of the deadline to submit a proposed schedule for next steps in each of the Individual Actions, which the Court in each of the Individual Actions so-ordered on August 27, 2018;

WHEREAS, after conferring, the parties hereto believe the below schedule is fair and reasonable.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the parties hereto, through their undersigned counsel, subject to the Court’s approval, as follows:

1. Defendants Perrigo, Papa, and Brown shall move, answer, or otherwise respond to the complaints in the Individual Actions on or before November 21, 2018; and
2. In the event that Perrigo, Papa, and/or Brown moves to dismiss any complaint in

the Individual Actions:

- (a) Plaintiffs in the Individual Actions shall have until January 30, 2019 to serve opposition papers; and
- (b) Perrigo, Papa, and Brown shall have until February 28, 2019 to serve reply papers in further support of their motion(s) to dismiss.

Dated: September 14, 2018

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SO ORDERED THIS __ DAY OF SEPTEMBER, 2018

Hon. Leda D. Wettre, U.S.M.J.